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MAY 25 2004

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May 20, 2004

Robin Sweeney
Office of National Transportation
Office of Civilian Radioactive Waste Management
U.S. Dept. of Energy
1551 Hillshire Dr., M/S 011
Las Vegas, NV 89134

Dear Mr. Sweeney:

The following are my comments on the proposed rail line from Caliente to Yucca Mt. I believe that three aspects of this rail line must be considered before any such construction should be contemplated.

First, the timing for such a rail line is premature. According to the Nuclear Regulatory Commission, there is no guarantee that high level nuclear waste can be stored safely at Yucca Mt. because of the possibility of the leakage of waste from the canisters into the water table. The decision may have to be made by Congress and the President to use dry cask storage on the sites where the waste is being generated until a safer method of disposal is discovered. Building a rail line before the site is guaranteed to be safe for the proposed 10,000 years is indeed putting "the cart before the horse."

Second, the waste has to be transported for thousands of miles since most of the nuclear plants are located in the Eastern part of the United States. If it is felt that transportation by railroad is safer than transportation by truck on highways, the entire railroad system needs to be examined, not just a small portion through Nevada. Presumably, present railroad lines would be utilized in most places, and many of these lines are in poor repair. If completely new lines were to be built, the cost would be astronomical. Bringing waste safely from New Hampshire to Yucca Mt. would involve an enormous amount of planning and expense. I saw no maps at the meeting in Reno on May 12 that showed complete routes, and no explanation was given about how this transportation could be accomplished in a safe, efficient way.

Third, the proposed line from Caliente to Yucca Mt. seems to have been selected without much consideration or on-the-ground research. The line is drawn inside two wilderness study areas and close to two others. I was informed by a Dept. of Energy employee at the Reno meeting that this was a mistake because they did not have good maps from the Bureau of Land Management. Since the line is entirely on BLM land, such a mistake seems to imply a complete lack of communication between the two agencies. I also learned from another Dept. of Energy employee that they had just received the information from the State of Nevada on threatened and endangered species in the area so that was not used in drawing the line. I found no information about any surveys for cultural resources or consultation with native tribes. There was also no information about endemic plants and animals that could be affected by such a mile-wide swath through what is mainly unoccupied and remote

land. If I were a rancher with a grazing allotment in the area, I would be gravely concerned.

When a railroad is built, it must be serviced. Water must be provided. Along the present rail route from Elko to Reno, there are many small towns that were really railroad towns, built to service the railroad. It is difficult to envision where this service would come from on the proposed line. And this line would have not only service but security problems.

Since you are presumably doing a complete and thorough Environmental Impact Statement on this rail line, I hope that the EIS would include a range of alternatives, including the "no action" alternative under NEPA.

I asked this specific question about the "no action" alternative of several Dept. of Energy employees at the meeting but got no definite answer.

Please keep me informed of any action that you plan to take on this proposed rail line.

Sincerely,

Marjorie Sill

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